

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON; et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION; et al.,

Defendants.

NO. 2:25-cv-01228-KKE

DECLARATION OF JASON PARKIN
IN SUPPORT OF STATES' REPLY IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION

DECLARATION OF JASON PARKIN

I, Jason Parkin, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct:

1. I am an Assistant Professor in School Psychology at Seattle University. I am over the age of 18 and have personal knowledge of all the facts stated herein, including knowledge based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I submit this Declaration in support of the Plaintiff States' Reply in Support of Plaintiffs' Motion for Preliminary Injunction.

Background

3. I graduated from the University of Missouri in 2010 with a PhD in School Psychology. After an internship in Texas, I practiced school psychology in Missouri and Washington State for nine years before transitioning into higher education. I started working at Seattle University as a Clinical Assistant Professor in 2018 and then hired into a tenure track role that began in the fall of 2021.

4. Seattle University is a private, Jesuit Catholic institution of higher education organized under the laws of the state of Washington. Seattle University's mission is dedicated to educating the whole person, to professional formation, and to empowering leaders for a just and humane world.

5. I lead The Puget Sound Partnership to Expand and Diversify the Mental Health Service Professional Pipeline project (the "PSP Project") at Seattle University.

6. The PSP Project is a partnership between Seattle University and Highline College, as well as multiple school districts, through which Seattle University and Highline commit to

recruiting students to receive need-based tuition scholarships and stipends to train at schools in high-need districts. The Letter of Agreement between Seattle University and Highline College is attached as **Attachment A**. Sample affiliation agreements with Kent School District and the Marysville School District are attached as **Attachments B** and **C**, respectively.

7. I serve as Co-Program Investigator and Project Director for PSP Project Grant, Award # S184X230021, which Seattle University received as part of the Department's Mental Health Service Professional Demonstration Grant Program.

The Department's Funding and Discontinuance of PSP Project Grant

8. The Mental Health Service Professional Demonstration Grant ("MHSP") attracts candidates for school-based mental health professions, including school psychology and school counseling, and provides training opportunities for students in "high-need" local educational agencies ("LEAs") (also referred to as "school districts"). The MHSP Grant facilitates partnerships between high-needs school districts and institutions of higher education, allowing opportunities for practicum students and interns to obtain required clinical supervision and increasing additional children and youth's access to school mental health services.

9. Seattle University applied for a multi-year MHSP grant on January 23, 2023.

10. In its application, Seattle University explained the overwhelming, unmet demand for school-based mental health practitioners in the Puget Sound region, especially in high-need schools and local education agencies. Depression, anxiety, self-harm, and academic challenges are at historic rates among children and adolescents (Centers for Disease Control, 2019). In its application, Seattle University further explained that it is imperative that we act now to support students suffering with mental health challenges by improving the pipeline of highly qualified school based mental health professionals from diverse backgrounds to support students, especially

after the disastrous effects of the COVID-19 pandemic on student academic and social/emotional development (U.S. Department of Education, 2022). Positive mental health promotes success academically and youth's ability to engage in life. By recruiting and retaining high impact school-based mental health trainees, the University's aim through the MHSP was to lay a strong biopsychosocial foundation for K-12 students that promotes positive, lifelong developmental outcomes. Unfortunately, Washington's ratios of students to school-based mental health service providers are below professional recommendations, 1:500 for school psychologists and 1:200 for school counselors. To meet that year's MHSP program priorities, Seattle University proposed the following goals for its MHSP project: 1) Expand the capacity of high-need LEAs by training and credentialing 64 highly capable school psychologists and school counselors to serve in high-need schools in high-need LEAs and creating a diverse pipeline of mental health service professionals trained in innovative, evidence-based, inclusive practices. An additional 32 students were to receive partial support from the program and serve high-need public schools after the end of the grant period. Collectively, this reflected 96 mental health trainees to be supported by this project, practicing in high-need public schools. 2) Diversify the pool of school psychologists and school counselors by recruiting students from diverse backgrounds, a partner minority-serving institution, and the communities served by high-need LEA partners.

11. On March 30, 2023, the Department awarded Seattle University PSP Project, Award No. S184X230021. The Grant Award Notification is attached as **Attachment D**. The performance period for this grant was April 1, 2023, through December 31, 2027, and authorized funding for the initial budget period of April 1, 2023, through December 31, 2024.

12. The Department granted continuation awards that funded subsequent budget periods as follows: for the period April 1, 2023 through December 31, 2023, \$605,531.00, plus

another \$173,057.00 subsequently added to this budget period for a total of \$778,588.00; for the period January 1, 2024 through December 31, 2024, \$857,430; for the period January 1, 2024 through December 31, 2024, \$857,430.00; for the period January 1, 2025 through December 31, 2025, \$681,172.00. The current budget period started on January 1, 2025, and ends on December 31, 2025. The grant continuation award document for the current budget period is attached as **Attachment E**.

13. Since the Department has awarded Seattle University this grant, we have provided support to 54 graduate students across the Seattle University school counseling and school psychology programs. These students are in various stages of training: 21 have graduated and either working in high-need school districts or actively seeking jobs. We have also expanded our training partnerships with local high-need school districts across the grant timeline. Our project has been approved to continue after each reporting cycle. Moreover, on July 24, 2025, Seattle University received an email from the Department explaining that after reviewing its Annual Performance Report (“APR”) submitted for 2024, the Department has determined that Seattle University has made substantial progress toward achieving the goals and objectives of the project, and the grants [*sic*] performance targets.” That email is attached as **Attachment F**.

14. Nevertheless, on April 29, the Department sent notice that Seattle University’s MHSP/PSP Project award would be discontinued at the end of the grant’s current budget period, which is December 31, 2025. Seattle University estimates that it will lose \$1,596,815.00 in prospective funding. The Department’s discontinuation notice is attached as **Attachment G**.

15. The notice came without any previous process or communication about the discontinuance from the Department. It purported to discontinue the grant based on 34 C.F.R. § 75.253(a)(5) and (f)(1). These regulations allow the Department to not continue a grant if it

determines that continuation of the project is not in “the best interest of the Federal Government.” 34 C.F.R. § 75.253(a)(5); 34 C.F.R. § 75.253(f)(1). In making this determination, the Department limited its considerations to “any relevant information regarding grantees’ performance.” 34 C.F.R. § 75.253(b). However, this notice failed to cite anything regarding Seattle University’s performance.

16. Rather it “determined that the grant specified above provides funding for programs that reflect the prior Administration’s priorities and policy preferences and conflict with those of the current Administration.” It then went on in boilerplate fashion to list a mishmash of reasons, claiming the programs: “violate the letter or purpose of Federal civil rights law; conflict with the Department’s policy of prioritizing merit, fairness, and excellence in education; undermine the well-being of the students these programs are intended to help; or constitute an inappropriate use of federal funds.” Based on this boilerplate language, Seattle University has no way of knowing which reason(s) applied as the Department’s basis for discontinuing the MHSP grant for the PSP Project.

Harms from the Department’s Decision to Discontinue Seattle University’s Grant

17. The discontinuance of the Seattle University’s MHSP grant will end the PSP Project.

18. Although Seattle University can still access funding through the end of our current budget period on December 31, 2025, in addition to the funding losses that it will incur, Seattle University is already experiencing the harmful effects of this discontinuance. This includes the inability to recruit students for scholarships that would have been funded through the grant (and therefore trainees that would have been placed in high-needs districts), as well as an inability to support local high-need school districts in their provision of training opportunities for students.

Some students in the program have had to scramble to find other ways to finance their education, taking on additional debt to finish their degrees.

19. Moreover, if the Department does not rescind its discontinuation decision, it jeopardizes the continuation of a pipeline of trained school-based mental health service providers into high-need school districts and maintains the over-burdened student-to-staff ratios that cannot keep up with the mental health needs of Washington State's student population.

20. Even if the Department were to re-bid MHSP funds, and Seattle University were to receive a new grant award, the harm would already be done. PSP Project investigators will need to re-establish training partnerships, verify availability of professional supervisors and begin to recruit students into the program again. Seattle University's current group of new graduate students were not provided the opportunity to devote their training and professional service to high-need districts through this grant project and had to accrue student loans that they would not have needed to take on had the program not received a discontinuation notice.

Conclusion


21. The discontinuances of Seattle University's MHSP grant undermines the mission of Seattle University of educating the whole person, to professional formation, and to empowering leaders for a just and humane world, and the PSP Project's goal of increasing the pipeline of mental health professionals to be placed at high-need schools in the Puget Sound region, including local public schools; as well as the Department's "mission to ensure equal access to education and to promote educational excellence throughout the Nation." 20 U.S.C. § 1228a(a). These discontinuances make it harder to train and secure talent and to fund providers so that our children may access mental health services. To meet budgetary deadlines, Seattle University and its partners are making difficult decisions and are already in the process informing graduate students that they

have lost significant tuition assistance. These harms are ongoing and will be irreparable if they are not stopped.

22. On May 27, 2025, Seattle University submitted a request for reconsideration of the Department's decision to discontinue the grant. On May 28, 2025, the Department sent Seattle University an email confirming receipt of the request for reconsideration. **Attachment H.** As of August 14, 2025, Seattle University had not received any substantive response to its request for reconsideration. Therefore, on August 14, 2025, Seattle University withdrew its request for reconsideration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 18 day of Aug, 2025, at Seattle, WA.

A handwritten signature in blue ink, appearing to read "J. Parkin", is written over a horizontal line.

Jason Parkin
Assistant Professor
Project Director, Seattle University PSP Project